

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, et al.,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY,

Defendant.

Civil Action Nos.
99-30225, 99-30226,
and 99-30227-MAP
(consolidated)

Filed June 20, 2006
ENTERED: JUNE 23, 2006

FOURTH MODIFICATION OF CONSENT DECREE

WHEREAS, the United States hereby files for this Court's approval this Fourth Modification to the Consent Decree ("Decree") in this action among the United States, the Commonwealth of Massachusetts (the "State"), the State of Connecticut ("Connecticut"), the City of Pittsfield (the "City"), the Pittsfield Economic Development Authority ("PEDA"), and the General Electric Company ("GE") relating to the GE-Pittsfield/Housatonic River Site ("Site"). This Court approved the Decree on October 27, 2000. Pursuant to the Decree (and without admitting liability), GE is required to perform and/or pay for response actions to remediate contamination at the Site, to reimburse the United States, the State, and Connecticut certain response costs incurred with respect to the Site, and to take actions to address alleged damages to natural resources.

WHEREAS, the parties to the Consent Decree have made three prior modifications to the Consent Decree. First, on February 6, 2002, the United States filed a First Modification to the Consent Decree which provided for the following six non-material modifications to the Consent Decree: inclusion of an additional property in the Decree; modification of the Peer Review



Process; modification to the schedule for the submission of Grants of Environmental Restrictions and Easements; modification to the schedule for submission of initial Removal Design/Action Work Plans; an addendum to the Upper ½ Mile Reach Removal Action Work Plan; and a modification to the location for payments to the Commonwealth.

Second, on May 15, 2003, the Court approved a Second Modification to the Consent Decree, to modify the agreement for EPA recovery from GE of "Indirect Costs" incurred with respect to the Site.

Third, on April 1, 2005, the Court approved a Third Modification to the Consent Decree, which required that GE's natural resource restoration/enhancement obligations for an approximately 20,000 square foot area in the Lyman Street Area be carried out instead, together with the necessary associated remediation, at another location, as part of a larger riparian buffer area in the Removal Action Area known as East Street Area 2-South.

WHEREAS, the United States, the State, Connecticut, and GE (the "Modification Parties") have all provided their written approval of this Fourth Modification. Pursuant to Decree Paragraphs 216 and 217, written notification of this Modification was provided to the City of Pittsfield and PEDDA. The City and PEDDA consent to this Fourth Modification.

WHEREAS, this Fourth Modification changes the Decree in two respects: (i) it slightly expands the maximum horizontal extent of the acreage of the Hill 78 On-Plant Consolidation Area ("Hill 78 OPCA"), without changing the elevation or capacity of that OPCA, and (ii) it clarifies that crushed building debris from buildings formerly located within the 40s Complex at the GE Plant Area may be used, under certain conditions, at certain properties that GE has or will transfer to PEDDA, in lieu of materials originating from an off-site location, with EPA written

approval, and that crushed building debris from the 30s Complex may be used as grading material at the 30s Complex.

WHEREAS, Paragraph 15 of the Decree and Sections 2.1.4 and 2.1.5 of the *Statement of Work for Removal Actions Outside the River* ("SOW") attached as Appendix E to the Decree provide that excavated materials and building demolition debris may be permanently consolidated in On-Plant Consolidation Areas ("OPCAs") at the GE Plant Area and that building debris may be placed in the foundations of certain buildings and covered with an engineered barrier.

WHEREAS, GE has constructed and is using the Hill 78 OPCA. The Hill 78 OPCA is limited to receiving materials that contain, on average, less than 50 parts per million of polychlorinated biphenyls ("PCBs") and are not classified as a hazardous waste under regulations issued pursuant to the Resource Conservation and Recovery Act. When the placement of materials is complete, the Hill 78 OPCA will be covered with an impermeable liner, a layer of soil fill material, topsoil, and vegetation.

WHEREAS, the Modification Parties agreed to slightly modify the footprint of the Hill 78 OPCA to: (a) reduce the extent of the OPCA on the northern boundary by approximately 0.24 acre so that it is farther away from the Allendale Elementary School, which is located to the north of the Hill 78 OPCA; (b) reduce the extent of the OPCA on the southeastern side by approximately 0.16 acre to maintain a suitable area for continued operation of an existing perimeter access road; and (c) expand the horizontal extent of the Hill 78 OPCA on the south/southwestern side by approximately 0.8 acre to compensate for the capacity lost through the foregoing revisions. The new Hill 78 OPCA areas abut GE-owned industrial properties. This modification does not change the capacity or maximum elevation of the Hill 78 OPCA, and it

only slightly increases, by approximately 0.4 acre, the overall horizontal extent of the Hill 78 OPCA from that stated in Section 2.1.4.2 of the SOW. This Modification does not affect any of the other OPCAs.

WHEREAS, regarding the modification concerning the use of crushed building debris, it will be efficient and beneficial to use such debris on properties to be redeveloped by PEDAs, instead of transporting them to an OPCA or off-site. One area in which GE was required under the Decree to evaluate the need for soil remediation and, if necessary, conduct such remediation is known as the 40s Complex on the GE Plant Area. The 40s Complex is among the areas subject to a separate Definitive Economic Development Agreement (“DEDA”) entered into among GE, the City, and PEDAs. To allow for the construction of new buildings, GE has demolished a number of old buildings formerly located at the 40s Complex. To assist its redevelopment efforts, GE and PEDAs requested that they be able to stockpile at the 40s Complex area crushed brick and concrete from the demolition of the 40s Complex buildings up to the limits shown in Figures E-1 and E-2 of Attachment E (“Proposal for Stockpiling Building Materials”) to GE’s July 6, 2005 *Supplemental Building Material Characterization Report -- Buildings 42, 43/43-A, 44, 40s Complex* until PEDAs finalizes a redevelopment grading plan, at which point the stockpiled brick and concrete may be used for backfill or grading purposes in the properties that GE agreed to transfer to PEDAs under the DEDA. These properties are identified in Appendix I to the Decree, and are known as the 19s, 20s, 30s, and 40s Complexes (the “PEDAs Properties”). In addition, crushed material will be used to fill in and stabilize the foundations of Buildings 42, 43, 43-A, and 44. The material was characterized and found to meet or be lower than the PCB and non-PCB Performance Standards applicable to soil at the 40s Complex. The

Commonwealth of Massachusetts Department of Environmental Protection ("MassDEP") has determined that the stockpiling of crushed material at the 40s Complex area meets the substantive requirements of MassDEP's solid waste regulations (310 CMR 16.05), specifically the ABC Rubble Requirements.

WHEREAS, in a portion of the GE Plant Area known as the 30s Complex, GE has used for grading purposes building debris from buildings formerly located in the 30s Complex that were characterized and found to meet or be lower than the PCB and non-PCB Performance Standards applicable to soil at the 30s Complex. This material has been covered with topsoil and grass. GE has transferred the 30s Complex area to PEDDA for reuse. Prior to such transfer, PEDDA requested that GE use such building material for grading to provide suitable level building sites. MassDEP has determined that the stockpiling of crushed material at the 30s Complex area meets the substantive requirements of MassDEP's solid waste regulations (310 CMR 16.05), specifically the ABC Rubble Requirements.

WHEREAS, the Decree and SOW do not expressly prohibit the use of crushed building debris for grading and backfill purposes.

WHEREAS, the Modification Parties seek to clarify that crushed building debris meeting certain criteria may be used, under certain conditions, at the PEDDA Properties in lieu of materials originating from an off-site location, with EPA written approval. These materials may also be used in building foundations other than those expressly identified in Section 2.1.5 of the SOW. The use of such materials is more efficient than transporting them to one of the OPCAs or to an off-site location. It will involve less truck traffic and less transport of materials over public roads. Furthermore, the reuse of this material will save PEDDA the expense of purchasing backfill to protect building foundations and to achieve certain grades.

NOW, THEREFORE, the Decree, including its appendices, is hereby modified as follows:

Hill 78 OPCA Maximum Horizontal Extent Modification

1. The approximate maximum horizontal extent of the Hill 78 OPCA, as specified in the SOW, at Section 2.1.4.2, paragraph 2, and in Performance Standard 1 of the *Detailed Work Plan for On-Plant Consolidation Areas* ("Detailed OPCA Work Plan"), dated June 1999, included in Annex 1 to the SOW, shall be modified to increase from 5.6 acres to 6.0 acres. Also, related to such modification, Figure 5 of the Detailed OPCA Work Plan, insofar as it depicts the Hill 78 OPCA, shall be modified to conform to Figure 1 attached hereto, titled *Revised On-Plant Consolidation Area Footprint*, dated 04/13/06, prepared by Blasland, Bouck & Lee, Inc. The following Figures are also modified to conform to Figure 1 attached hereto: Figure Appendix A-4 of Appendix A to the Decree; Figures 1-1 and 1-2 of the SOW; Figure E-1 of SOW Attachment E; Figures H-1 and H-5 of SOW Attachment H; Figure I-3 of SOW Attachment I.

2. The maximum elevation and the overall capacity of the OPCAs are not modified by the revision to the maximum horizontal extent of the Hill 78 OPCA set forth above in Paragraph 1. Also, the Performance Standards applicable to the Hill 78 OPCA are not changed, except that the maximum approximate horizontal extent of the Hill 78 OPCA, as stated in paragraph 2 of SOW Section 2.1.4.2, and in Performance Standard 1 of the Detailed OPCA Work Plan, shall be increased from 5.6 to 6.0 acres. To the extent the Decree and SOW are otherwise inconsistent with the modification of the Hill 78 OPCA footprint, the Decree and SOW are also hereby modified to conform to the modified acreage and footprint.

Use of Building Debris within the PEDDA Properties

3. Paragraph 15 of the Decree and Sections 2.1.4 and 2.1.5 of the SOW are clarified to confirm that crushed building debris from buildings formerly located on the 40s Complex may be used at the PEDDA Properties, including without limitation, placement in or on building foundations without being covered with an engineered barrier, in lieu of materials originating from an off-site location, with EPA written approval. Such building debris shall meet the following requirements: (i) such debris shall be used only for depths greater than one foot below grade; (ii) the average PCB concentration in such debris shall not exceed 25 parts per million; (iii) for non-PCB constituents listed in Appendix IX of 40 CFR Part 264, either the maximum concentrations of such constituents shall not exceed EPA Region 9's Preliminary Remediation Goals ("PRGs") for industrial/commercial property, as amended (or EPA-approved surrogate PRGs for compounds without a published PRG), or, for any constituents that exceed such PRGs, the average concentrations of such constituents shall not exceed the MassDEP Method 1 Category S-2 (GW-2/GW-3) soil standards, as amended; and (iv) such debris shall not cause the averaging area receiving the materials to exceed the soil-related Performance Standards applicable to that averaging area.

4. With respect to stockpiling crushed bricks and concrete at the 40s Complex, GE shall be required to comply with the conditions found in Attachment E ("Proposal for Stockpiling Processed Building Materials") to GE's *Supplemental Building Material Characterization Report, Buildings 42, 43/43-A, 44, 40s Complex*, dated July 2005, as conditionally approved by a letter from EPA to GE dated August 18, 2005. These requirements are included as Attachment A to this Fourth Modification.

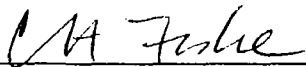
5. Paragraph 15 of the Decree and Sections 2.1.4 and 2.1.5 of the SOW are clarified to confirm that the crushed building debris currently placed on the 30s Complex may remain as grading material. Such debris was characterized for contamination and was found to meet or be lower than the PCB and non-PCB Performance Standards applicable to soil in the 30s Complex. The future excavation and disposition of such debris shall be governed by the terms of a Grant of Environmental Restriction and Easement (the "Grant") that restricts the use of the 30s Complex property. The Grant was recorded on February 10, 2005 in the Berkshire Middle District Registry of Deeds at Book 3156, Page 71.

THE UNDERSIGNED PARTY enters into this Fourth Modification of Consent Decree in the matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site.

UNITED STATES OF AMERICA

Sue Ellen Wooldridge
Assistant Attorney General
Environment and Natural Resources
Division

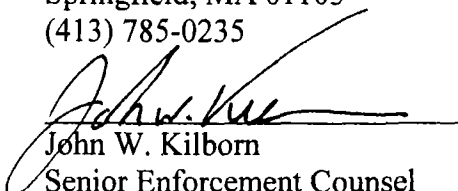
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Date: June 13, 2006


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THE UNDERSIGNED PARTY enters into this Fourth Modification of Consent Decree in the matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site.

COMMONWEALTH OF MASSACHUSETTS

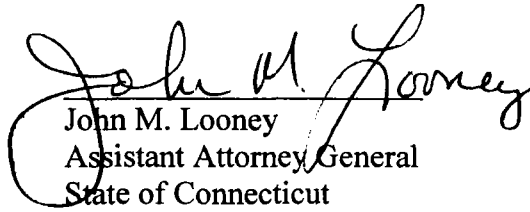
6/16/06
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Nancy E. Harper / S65
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THE UNDERSIGNED PARTY enters into this Fourth Modification of Consent Decree in the matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site.

STATE OF CONNECTICUT

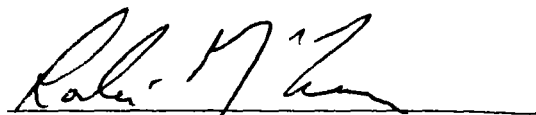
June 2, 2006
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THE UNDERSIGNED PARTY enters into this Fourth Modification of Consent Decree in the matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site.

Date: 6/9/06

GENERAL ELECTRIC COMPANY



Roderic McLaren, Esq.
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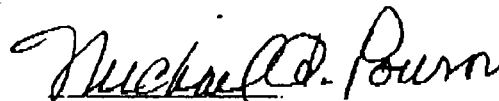
The attached Fourth Modification of Consent Decree, in the matter of matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site, is hereby approved.

SO APPROVED THIS ____ DAY OF _____, ____.

Michael A. Ponsor
United States District Judge

The attached Fourth Modification of Consent Decree, in the matter of matter of United States, the Commonwealth of Massachusetts, and the State of Connecticut v. General Electric Company, relating to the General Electric-Pittsfield/Housatonic River Site, is hereby approved.

SO APPROVED THIS ^{23rd}~~23~~ DAY OF June 2006


Michael A. Ponsor
United States District Judge

ATTACHMENT A

ATTACHMENT E
PROPOSAL FOR STOCKPILING PROCESSED BUILDING MATERIALS
40s COMPLEX

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

I. Introduction

The General Electric Company (GE) is currently in the process of performing building demolition activities at Buildings 42, 43/43-A, and 44, which are part of the 40s Complex Removal Action Area (RAA) located in Pittsfield, Massachusetts. Prior to demolition of these buildings, characterization samples were collected to support the current demolition work and to identify and evaluate potential disposal/re-use options. The initial evaluations indicated that select materials would require consolidation at the Building 71 OPCA (due to polychlorinated biphenyl (PCB) concentrations exceeding the Toxic Substances Control Act [TSCA] regulatory limit of 50 ppm), while the majority of the demolition materials could be consolidated at the Hill 78 OPCA. However, the Pittsfield Economic Development Authority (PEDA) and GE expressed an interest in re-using select processed building demolition materials (e.g., crushed brick and concrete) for backfill/grading purposes within the 40s Complex RAA, provided that the appropriate Performance Standards specified in the October 27, 2002 Consent Decree (CD) and *Statement of Work for Removal Actions Outside the River* (SOW) were achieved. As a result of those discussions, GE initiated discussions with the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MDEP) regarding the re-use of certain processed building demolition materials in the 40s Complex RAA. Those discussions resulted in the identification of additional characterization sampling and evaluation activities beyond those required to characterize the building demolition debris for consolidation at the OPCAs, as presented in GE's Proposal for Supplemental Building Material Characterization Activities - Buildings 42, 43/43-A, 44 (Supplemental Building Characterization Proposal), and as conditionally approved by EPA in a June 7, 2005 letter. The results of that characterization and evaluation activity are presented in GE's Supplemental Building Material Characterization Report - Buildings 42, 43/43-A, 44 (Supplemental Building Characterization Report).

The supplemental building material characterization activities were documented in Section I of the Supplemental Building Material Characterization Report, while Section II of that report provided an overview of the evaluations performed by GE to determine if the building demolition debris would be acceptable for use as backfill/grading materials within the 40s Complex. As indicated in Section II of that report, the data for the building demolition materials (excluding those materials proposed for consolidation at the Building 71 OPCA) satisfy the applicable Performance Standards specified in the SOW for PCBs and non-PCB constituents and are acceptable for re-use as backfill/grading materials within the 40s Complex. Since the PCB and Appendix IX+3 results indicate that the use of the building demolition debris as backfill/grading materials would not impact the achievement of the applicable Performance Standards for the 40s Complex, GE anticipates that the material will be used for this purpose. Prior to use, it is possible that the material will need to be stockpiled. Therefore, on the possibility that a stockpile will be necessary, GE has developed this proposal to stockpile a portion of the processed building demolition material (i.e., those materials that are not being consolidated at the Building 71 OPCA or used within the 40s Complex RAA for roadway support and building slab covers) in accordance with Comment No. 3 of EPA's June 7, 2005 conditional approval letter. That stockpile, if constructed, will be located in the western portion of the 40s Complex RAA, as depicted on Figure E-1, for re-use by PEDA during re-development of the 40s Complex RAA once a final grading plan has been established.

As indicated in Comment No. 3, the MDEP also reviewed the Supplemental Building Characterization Proposal to determine the appropriateness of using the processed building materials as backfill/grading materials (i.e., stockpiling processed materials, and re-use as grading materials upon PEDAs development of a final grading plan). In its review, as indicated in the EPA June 7, 2005 conditional approval letter, MDEP determined that the substantive requirements of MDEP's solid waste regulations (310 CMR 16.05), specifically the ABC Rubble Requirement, were met. The remainder of this attachment presents GE's proposal for the design, construction, and monitoring of a stockpile for the processed building demolition debris, if such a stockpile is needed.

II. Design, Construction, and Maintenance Criteria

In accordance with Comment No. 3 in EPA's June 7, 2005 conditional approval letter, any stockpile for the processed building materials generated from the demolition of Buildings 42, 43/43-A, and 44 will meet the following design/construction criteria:

- The limits of the stockpile have been identified on Figure E-1. Those limits are the maximum "build-out" limits and may be lessened (in vertical and/or horizontal directions) based upon the actual amount of material subject to placement in the stockpile.
- For portions where the existing ground cover under the future stockpile area are unpaved and/or consist of broken pavement with a consistency similar to the processed building materials (i.e., gravel), a physical barrier (e.g., non-woven permeable geotextile material) will be placed on the surface before placement of the demolition material to act as a demarcation between the existing ground surface and the processed building materials.
- As shown on Figures E-1 and E-2, the northern edge of the stockpile will be tapered into the existing grade along Kellogg Street with a proposed maximum elevation of approximately 1,019 feet above mean sea-level (amsl). The proposed elevations shown on Figure E-1 also include a 4-inch thick layer of topsoil that will be seeded with a grass seed mix. In addition to these features, an erosion control mat will also be installed along the northern edge and eastern slope of the stockpile to minimize erosion/formation of gullies as a result of runoff from storm events.
- Figures E-1 and E-2 also depict that the maximum slope along the eastern, southern and western sides of the proposed stockpile will be 25% (4 horizontal to 1 vertical) and the top of the proposed stockpile will be graded at approximately 1% sloping downward in an easterly direction. This grading scheme is designed to minimize erosion and transport of the stockpiled materials as well as to maintain drainage in the 40s Complex RAA. Other erosion control methods include the installation of rip-rap along the eastern edge and 2-inch stone along the southern and western edges of the toe-of-slope to dissipate storm water runoff from the stockpile (Figure E-2).
- Prior to placement, the building materials they will be processed (crushed) until the maximum particle size will pass through a 3 inch sieve (commonly referred to as 3-inch minus material). To meet this performance criterion, it may be necessary to process the building materials more than once.
- Once any portion of the building materials have been processed to meet the 3-inch minus performance criteria, that material will be placed within the stockpile area. It is anticipated that the processed material will be transported to the area in dump trucks and then spread using conventional construction equipment in 12- to 18-inch thick lifts, as this material is not being placed to meet the requirements of structural fill.

- After the processed material has been placed in the stockpile area in the appropriate lift thickness, it will be compacted with a vibratory roller, alternating the direction of travel on each lift (i.e., perpendicular to the previous lift), until the surface is hard and non-yielding or a minimum of four passes have been achieved, whichever occurs first.
- During placement of the processed building materials within the temporary stockpile GE shall implement dust suppression methods to minimize dust generation to a threshold of "no visible dust". These suppression methods will be conducted in accordance with those outlined in Section 7 of Attachment D to GE's Project Operations Plan (POP) and will be conducted, when necessary, until such time that a vegetative cover is fully established.
- After construction of the temporary stockpile is completed, GE will perform inspection activities consistent with those provided in Attachment J of the SOW. These activities will include an initial inspection of the vegetated soil covers within one month after completion, semi-annual inspections for the first year after construction (GE anticipates performing such inspections conducted in April and October), and annually thereafter. In addition to these scheduled inspections, GE will inspect the vegetated soil covers after severe storm events (those with 10- to 20-year return periods or greater) to verify that the cover systems have not sustained significant damage. The inspections and corrective actions will include the following:
 - Visually inspect the vegetated surfaces for evidence of topsoil erosion, damage to the synthetic components (e.g., erosion control mat, geotextile), uneven settlement relative to the surrounding/final topography, areas of bare or sparse vegetation, signs of ponding water from storm events, vehicle ruts and/or other visual abnormalities;
 - Visually compare the existing surface grades with the final grading plan prepared upon completion of stockpile construction;
 - If during the visual inspections, areas that are undisturbed (i.e., those areas not being used to obtain material for backfill/grading purposes) are identified to be deficient with components shown on Figures E-1 and/or E-2 – or – surface abnormalities are present, GE will repair those areas and if needed re-install topsoil and/or seed those areas that are bare or have sparse vegetation; and
 - Conduct periodic maintenance of the soil covered areas after vegetation has been established, which will include mowing once every two to three weeks (depending on growth) and, if necessary, watering to keep the vegetative layer from dying.
- Stockpiled materials that are not re-used within five years from the date of completion of the stockpile shall be removed and properly disposed, unless GE requests and EPA approves a proposal to extend the duration of time that the temporary stockpile can remain at the proposed location and/or EPA approves relocating some or all of the remaining material for potential re-use at another location covered by the CD. EPA may require the removal of the stockpile material if the preceding performance/design criteria are not met.

A proposed checklist for use during the inspection of the vegetated cover has been included with this proposal as Exhibit E-1. The completed checklists will be kept on file by GE.

EXHIBIT E-1

STOCKPILE AREA INSPECTION CHECK LIST
40s COMPLEX RAA**SUAL ON-SITE INSPECTION**Conducted By: _____ Representing: _____
Inspection Start Date: _____

List other individuals and their company/agency that were present during the visual on-site inspection.

Is there any visual evidence that the soil cover has been altered since the last inspection?

- ☐ No
☐ Yes - If yes, describe below and indicate on a copy of the topographic map.

Is there any visual evidence that the stockpile is being utilized as a source of backfill/grading material?

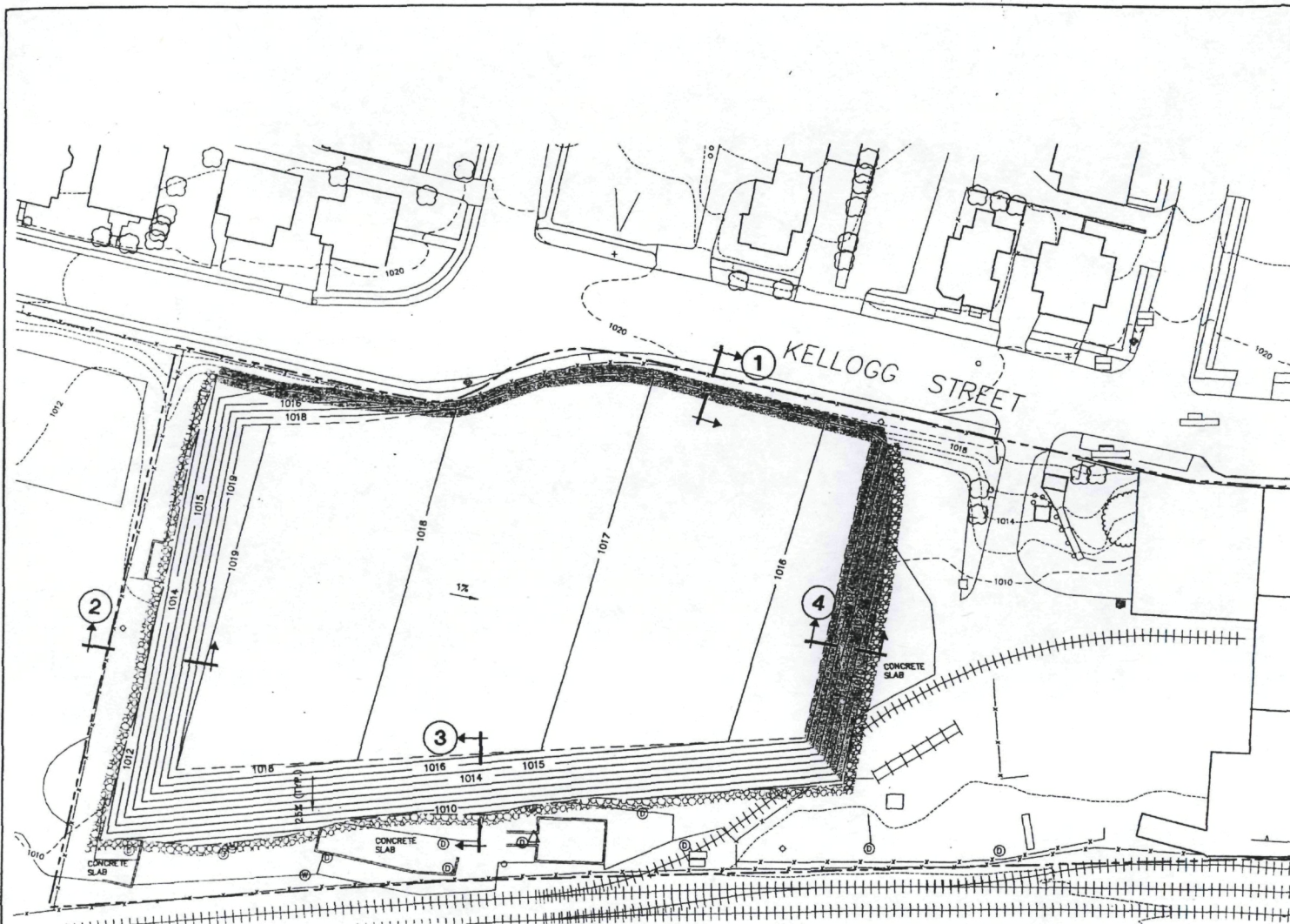
- ☐ No, (goto question 5)
☐ Yes - If yes, describe below and show the location(s) of such activity on a plan, also see question 4.

Is the entity using the stockpile as a source of backfill/grading material following the general "house-keeping" practices by maintaining side slopes at a maximum of 25% (4 horizontal to 1 vertical), installation of soil erosion control measures (i.e., silt fence, hay bales), dust suppression measures, and/or other items necessary to control migration of materials from the stockpile?

- ☐ No - If no list deficiencies
☐ Yes - If yes, describe below and show the location(s) of such activity on a plan.

Is there any visual evidence of excessive soil erosion since the last inspection?

- ☐ No
☐ Yes - If yes, describe below and show the location(s) of such erosion on a plan.



LEGEND:

- 1012 EXISTING INTERMEDIATE ELEVATION CONTOUR
- 1020 EXISTING INDEX CONTOUR ELEVATION
- RAILROAD TRACKS
- 1014 PROPOSED ELEVATION CONTOUR (SEE NOTE 2)
- EXISTING FENCE
- APPROXIMATE PROPERTY LINE LOCATION
- UTILITY POLE
- PROPOSED GRADE BREAK
- PROPOSED RIPRAP (SEE FIGURE C-2)
- PROPOSED 2" STONE (SEE FIGURE C-2)
- EROSION CONTROL MAT (SEE FIGURE C-2)
- PROPOSED LIMIT OF GRADING (SEE NOTE 4)

NOTES:

1. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 6/2/01.
2. FINAL ELEVATIONS SHOWN INCLUDE PLACEMENT OF A 4-INCH THICK TOPSOIL LAYER.
3. ACCESS TO TOP OF STOCKPILE TO BE DETERMINED AT TIME OF CONSTRUCTION.
4. PROPOSED LIMIT OF GRADING SHOWN IS CONCEPTUAL ONLY. ACTUAL LOCATION MAY VARY BASED ON SITE CONDITIONS AT TIME OF CONSTRUCTION.



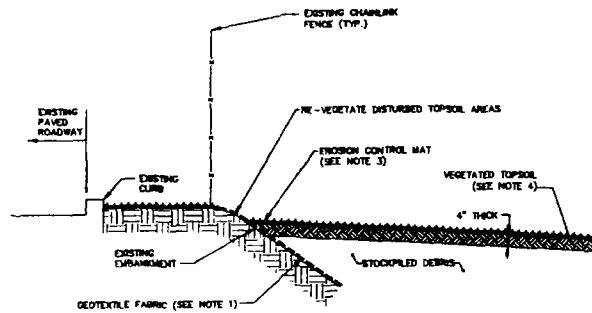
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
40s COMPLEX TEMPORARY STOCKPILE

SITE PLAN

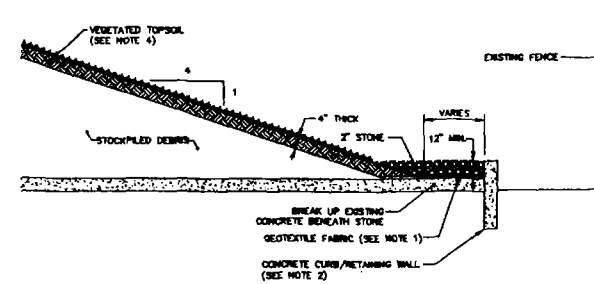
BBL
WASLAND, NOCKE & LEE, INC.
engineers, planners, economists

FIGURE
E-1

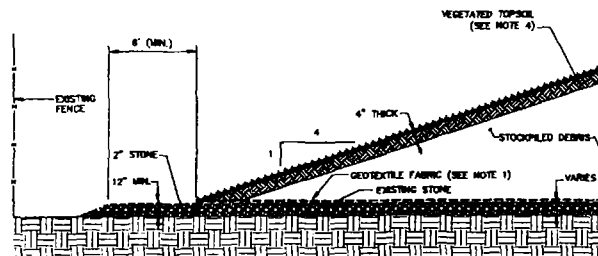
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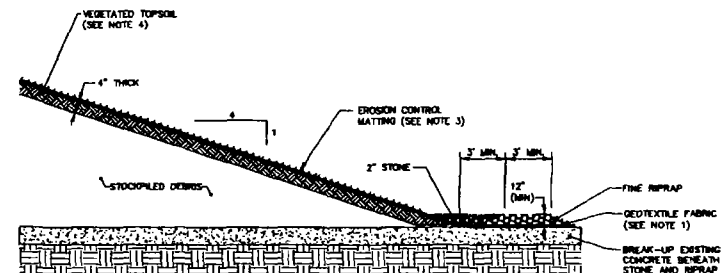
SECTION 1
NOT TO SCALE



SECTION 3
NOT TO SCALE



SECTION 2
NOT TO SCALE



SECTION 4
NOT TO SCALE

NOTES:

1. GEOTEXTILE FABRIC SHALL BE PLACED ON UN-PAVED SURFACES PRIOR TO DEBRIS PLACEMENT. GEOTEXTILE SHALL BE AMOCO 4510 (NON-WOVEN) OR EQUAL. GEOTEXTILE EDGES SHALL BE OVERLAPPED A MINIMUM OF 12 INCHES.
2. WHERE CONCRETE CURB/RETAINING WALL IS NOT PRESENT, USE STONE CONDITION SHOWN IN SECTION 2.
3. EROSION CONTROL MAT SHALL BE NORTH AMERICAN GREEN S150 OR EQUAL AND INSTALLED PER MANUFACTURE'S SPECIFICATIONS.
4. TOPSOIL SHALL BE HYDROSEEDING/MULCHED A 1-STEP PROCESS IN WHICH SEED, FERTILIZER, HYDRAULIC MULCH, AND MULCH ADHESIVE ARE APPLIED SIMULTANEOUSLY IN A WATER SLURRY VIA HYDRAULIC SEEDER/MULCHER. SEED MIX SHALL CONSIST OF 80% KENTUCKY BLUEGRASS, 20% PERENNIAL RYE GRASS, AND 13% FESCUE. MULCH SHALL CONSIST OF FINELY GROUND CELLULOSE PULP. THE CONTRACTOR MUST SUBMIT ALL DATA REGARDING MATERIALS AND APPLICATION RATES FOR REVIEW. ALL BARE OR POORLY VEGETATED AREAS MUST BE RESEEDING AND MULCHED AS NECESSARY.
5. LIMITS AND EXTENTS OF EXISTING STONE AND CONCRETE MAY VARY FROM CONDITIONS SHOWN.

DRAFT
PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
40s COMPLEX TEMPORARY STOCKPILE

SECTIONS

BBL
BARLAND, BOND & LEE, INC.
ENGINEERS, ARCHITECTS, PLANNERS

FIGURE
E-2

FIGURE 1

VOLUME LOST

SECTION A-A'

NOT TO SCALE

VOLUME GAINED

SECTION B-B'

NOT TO SCALE

HILL 78 CONSOLIDATION AREA

APPROXIMATE VOLUME LOST
BY FOOTPRINT REVISION
14,000 cy

APPROXIMATE VOLUME
GAINED BY FOOTPRINT
REVISION 19,000 cy

BUILDING 71
CONSOLIDATION AREA

APPROXIMATE
VOLUME LOST BY
PERIMETER
ACCESS ROAD
5,000 cy

- LEGEND:
- EXISTING BUILDING OR STRUCTURE
 - EXISTING ROADS
 - NON-TSCA/NON-RCRA AREA
 - TSCA/RCRA AND NON-TSCA/NON-RCRA AREA
 - APPROXIMATE LIMIT OF APPROVED CONSOLIDATION AREA FOOTPRINT
 - APPROXIMATE LIMIT OF REVISED CONSOLIDATION AREA FOOTPRINT
 - EXISTING SECURITY FENCE

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY AND BLASLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS, AND ON OBSERVATIONS DURING A SITE VISIT BY BBL PERSONNEL ON DECEMBER 3, 1997.
2. SITE BOUNDARIES ARE APPROXIMATE.
3. NOT ALL PHYSICAL FEATURES SHOWN.

0 100' 200'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
ON-PLANT CONSOLIDATION AREAS

REVISED ON-PLANT
CONSOLIDATION AREA FOOTPRINT

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE

1

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